

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

WILD SALMON RIVERS d/b/a THE  
CONSERVATION ANGLER; and WILD FISH  
CONSERVANCY,

Plaintiffs,

v.

NATIONAL MARINE FISHERIES SERVICE;  
and UNITED STATES DEPARTMENT OF  
COMMERCE,

Defendants.

Case No. 3:21-cv-00116-JHC

STIPULATED MOTION TO EXTEND  
INITIAL DEADLINES AND  
ORDER

**STIPULATED MOTION**

Pursuant to Federal Rule of Civil Procedure 6(b), Plaintiffs Wild Salmon Rivers d/b/a/ The Conservation Angler and Wild Fish Conservancy (collectively, “Conservation Groups”) and Defendants the U.S. Department of Commerce and National Marine Fisheries Service (collectively, “the Service”) hereby stipulate and respectfully move the Court to extend the initial deadlines set by the Court’s Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement, Dkt. No. 11 (“Order”), by thirty days.

Good cause exists for the requested extension. Since the complaint was filed on January 17, 2025, the Conservation Groups and the Service (collectively, the “Parties”) have engaged in

STIPULATED MOTION TO EXTEND INITIAL  
DEADLINES AND ORDER – 1  
Case No. 2:25-cv-00116-JHC

early settlement efforts. Those efforts are ongoing. The Parties seek to extend the initial deadlines set by the Court's Order so that they may continue to focus their efforts on settlement.

Accordingly, the Parties stipulate to and move the Court for a 30-day extension of the deadlines set by the Court's Order as follows:

Deadline	Current Schedule	Proposed Amended Schedule
FRCP 26(f) Conference	April 16, 2025	May 16, 2025
Initial Disclosures Pursuant to FRCP 26(a)(1)	April 30, 2025	May 30, 2025
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f)	May 5, 2025	June 4, 2025

RESPECTFULLY SUBMITTED this 15th day of April 2025.

KAMPMEIER & KNUTSEN, PLLC

By: s/ Brian A. Knutsen  
 Brian A. Knutsen, WSBA No. 38806  
 1300 S.E. Stark Street, Suite 202  
 Portland, Oregon 97214  
 Telephone: (503) 841-6515  
 Email: brian@kampmeierknutsen.com

Erica L. Proulx, WSBA No. 60155  
 705 Second Avenue, Suite 901  
 Seattle, Washington 98104  
 Telephone: (206) 739-5184  
 erica@kampmeierknutsen.com

*Attorneys for Plaintiffs Wild Salmon Rivers  
 d/b/a The Conservation Angles and Wild Fish  
 Conservancy*

ADAM R.F. GUSTAFSON

Acting Assistant Attorney General  
 NICOLE SMITH, Assistant Section Chief


By: s/ Maggie Baker Smith  
 Maggie Baker Smith, WSBA No. 42658  
 U.S. Department of Justice  
 Environment and Natural Resources Division  
 Wildlife and Marine Resources Section  
 7600 Sand Point Way, NE  
 Seattle, Washington 98155  
 Phone: (202) 598-3088  
 Fax: (202) 305-0275  
 Email: maggie.smith@usdoj.gov

*Attorneys for Defendants*

**ORDER**

PURSUANT TO STIPULATED MOTION, IT IS SO ORDERED.

DATED this 15th day of April, 2025.

A handwritten signature in black ink, appearing to read "John H. Chun", is written over a horizontal line.

JOHN H. CHUN  
United States District Judge